

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Request to Add Private Address Forwarding To the Market
Dominant Product List

Docket No. MC2013-60

ADDENDUM TO CLOSING MOTION - USPS PARTIAL FOIA RESPONSE

December 26, 2013

As promised, attached is the USPS' first, partial fulfillment of my FOIA request. It consists of 2 word marks and 1 slide presentation about Mail My Way (MMW, which I have converted to PDF). I have included my response to the partial FOIA fulfillment.

The response does not mention the product in USPS Patent #7,295,997 at all, nor does it provide any new information on the "Digital License Plate" product. The word mark information included is not more informative than the USPS' initial comments. It does however provide some insight into MMW.

Summary

Based on the MMW presentation, it appears that it is

- similar to my PAF proposal in that
 1. it stores recipients' delivery information in a partially private format
 2. it stores receiver preferences, similar to the (optional) system described in point 3 of my amended request, permitting receivers to opt out¹ of certain subject categories of (bulk) mail
 3. its use case #3 proposes a USPS-run server that translates a "virtual address" into a "delivery address"
- different to my PAF proposal in that

¹ or opt in; the presentation isn't clear

1. it is primarily intended for use by, and management of, bulk mailers — rather than for normal use as the primary, published delivery address of individual users of the mails, as PAF is
 - a. it discloses, en masse, the delivery preferences and hashed address of customers who match a bulk mailer's intended mass delivery
 - b. purely opt-in for senders' respect for users' delivery preferences (if they know the delivery address)
2. if the mailer provides a list of known addresses, it returns the subset of those addresses whose recipients' delivery preferences match the sender's proposed mailing
3. it provides for electronic delivery of physical mail — seemingly by allowing the USPS to open & scan incoming mail, or to inspect originally electronic mass mailing documents, and sending it to the recipient's e-mail address

Analysis

The presentation appears to indicate that its authors believe that MMW would be feasible, but likely to be opposed by bulk mailers and by third party mailers² (e.g. PostCom's membership) because it would reduce the amount of postal mail (by allowing "do not mail" preferences, or by redirecting some physical mail to electronic mail instead).

It is significantly different from my proposal in that it is primarily a service for bulk mailers (or for users to have a "do not mail" preference for them). It does not, as does my proposal, provide individual users with a (private forwarding) address that they can publish as a *public replacement* for their physical address. Bulk mailers would likely still possess the physical address, and are under no obligation to obey a recipient's preferences.

Under PAF, mailers would (over time) have only PAF addresses for PAF users, not known-to-be-current physical addresses, and thus PAF delivery preferences (if

² "USPS may receive backlash from its two main customers (senders and MSPs [Mail Service Providers]) as a result of decreased physical mail volume", MMW presentation

implemented) would be mandatory.

Also unlike PAF, it does not provide any of the privacy and convenience benefits of PAF for normal users interacting with *all* people needing to send them mail (who do not have an actual need to know their physical address).

As such, MMW would not provide most of the benefits of PAF. It is more similar to an optional "do not mail" preference management system. Without the backing of a law mandating that bulk users obey such preferences (like the Telephone Consumer Protection Act does for phone calls), it would be unlikely to have any substantial privacy or spam protection to users.

Nevertheless, by contrast to PAF, it would require users to interact with the system to express their preferences, requiring a burden to users without commensurate benefits.

It is also more complicated than the *core* PAF proposal, which would not require any communication system with senders (bulk or otherwise), but only processing and delivery of virtually addressed mail sent by normal means.

Evidentiary impact

The MMW presentation serves to further substantiate a presumption that my PAF proposal is likely to be feasible, at least for the purposes of initial review under [39 CFR 3020.55](#). It does not describe *any* significant operational problems, only political problems with opposition by entities such as those represented by PostCom, whose commercial interests it might be seen to harm.

As the record is still very small compared to that which the USPS possesses and is easily available to the PRC, the PRC must still subpoena the USPS for its other documents relating to PAF-like products, so that the PRC's determination and review is reasonably based on all of the evidence available to it.

However, the only *substantive* evidentiary record on this proceeding to date — namely, the

MMW presentation — consists of *positive* indicators for PAF's feasibility and desirability, which argues in favor of further proceedings to investigate and elaborate how the PAF proposal might begin to be implemented.

Sincerely,
Sai
Petitioner

usps@s.ai
+1 510 394 4724
PO Box 401159
San Francisco, CA 94110

ATTACHED: USPS partial FOIA response, MMW presentation (converted to PDF), and my counter-response



Sai . <saizai@gmail.com>

FOIA request 2014-FPRO-00057

1 message

Chavannes-Battle, Nancy P - Washington, DC <nancy.p.chavannesbattle@usps.gov>
To: "Sai (usps@s.ai)" <usps@s.ai>

Tue, Dec 24, 2013 at 9:59 AM

RECORDS OFFICE



December 24, 2013

Sai

PO Box 401159

San Francisco, CA 94110

RE: FOIA Case No. 2014-FPRO-00057

Dear Mr. Sai:

This responds to your email dated November 25, 2013, in which you responded to my email dated November 25, 2013 regarding fee estimate for your Freedom of Information Act request with tracking number 2014-FPRO-00057. You originally requested records pertaining to five listed items in connection with private address forwarding and PRC docket MC2013-60.

In your email you informed us to search within the Product Information Department. After contacting that department, responsible persons in the Product Information Department advised that a search of their files disclosed 14 pages of record material responsive to your request. All of these pages are being released to you in their entirety and are enclosed herewith.

Furthermore, we assumed you were amending your request by my email dated November 27, 2013 but you informed me in your November 27, 2013 email response that you were temporary limiting your request for a quicker response and that you still wanted all records from the Office of the General Counsel.

Since your fee waiver was denied, once we receive the payment provided to you in my November 6, 2013 letter, we will have the Office of the General Counsel begin searching for records responsive to your request.

I look forward to hearing from you soon on how to proceed with your request. If we do not hear back from you within 30 working days from the date of this letter, we will administratively close this case. Should you have questions concerning this request, I can be reached at (202) 268-2030.

Sincerely,

Nancy P. Chavannes-Battle

Nancy P. Chavannes-Battle

Consumer Research Analyst

Word Mark MAIL MY WAY

Goods and Services IC 035. US 100 101 102. G & S: Mailing services, namely, providing a secure and private interactive on-line computer database containing consumer product and service preferences, as determined by the customer, used to identify customers to participating business advertisers based on those consumer preferences identifying their interests, demographics, and desired method of receiving designated advertising integrating virtual, physical and e-mail addresses in order to expand a business' ability to target mailings, to maximize the effectiveness of mail campaigns, to optimize the application of mailing dollars, and to reduce mailing waste

Standard Characters Claimed

Mark Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 85970529

Filing Date June 26, 2013

Current Basis 1B

Original Filing Basis 1B

Published for Opposition September 17, 2013

Owner (APPLICANT) UNITED STATES POSTAL SERVICE independent establishment of the executive branch of the government of the United States of America UNITED STATES 475 L'Enfant Plaza, SW Washington D.C. 202601136

Attorney of Record SANDRA A. RILEY

Disclaimer NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "MAIL" APART FROM THE MARK AS SHOWN

Type of Mark SERVICE MARK

Register PRINCIPAL

Live/Dead Indicator LIVE

Word Mark **DIGITAL LICENSE PLATE**

Goods and Services IC 045. US 100 101. G & S: IDENTIFICATION VERIFICATION SERVICES, NAMELY, PROVIDING AUTHENTICATION OF PERSONAL IDENTIFICATION INFORMATION; IDENTIFICATION VERIFICATION SERVICES, NAMELY, PROVIDING AUTHENTICATION OF PERSONAL IDENTIFICATION INFORMATION VIA SECURE STORAGE AND TRANSMITTING SUCH INFORMATION VIA THE INTERNET; SECURITY CLEARANCE FOR PREPARATION OF IDENTIFICATION CARDS; SECURITY PRINTING, NAMELY, ENCODING IDENTIFICATION INFORMATION ON VALUABLE DOCUMENTS AND PRODUCTS

Standard Characters Claimed

Mark Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 86000747

Filing Date July 2, 2013

Current Basis 1B

Original Filing Basis 1B

Published for Opposition September 17, 2013

Owner (APPLICANT) UNITED STATES POSTAL SERVICE independent establishment of the executive branch of the government of the United States of America UNITED STATES 475 L'Enfant Plaza, SW Washington D.C. 202601136

Attorney of Record KAREN E. OWCZARSKI

Disclaimer NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "DIGITAL" APART FROM THE MARK AS SHOWN

Type of Mark SERVICE MARK

Register PRINCIPAL

Live/Dead Indicator LIVE

 **USPSSDS_PhysicaltoVirtual_MailMyWaySynopsis_20130515.pptx**
360K



Sai . <saizai@gmail.com>

FOIA request 2014-FPRO-00057

Sai <usps@s.ai>

Tue, Dec 24, 2013 at 12:18 PM

To: "Chavannes-Battle, Nancy P - Washington, DC" <nancy.p.chavannesbattle@usps.gov>

Thank you for your partial fulfillment of my FOIA request.

You interpret correctly that my last response to you was meant only to be consistent with my original request's clause requesting that my request be fulfilled partially to the extent possible should there be a problem fulfilling it completely, purely as a practical measure to expedite things — and not a waiver of interest in the remaining documents.

I note that there is a presentation on "Mail My Way" but not one for "Digital License Plate", and that there are no other documents other than the PPTX relating to the products — including their the development, (formal *or* informal) reviews of either product, emails, or the like. I note also that there is nothing regarding USPS Patent #7,295,997.

Do you represent that the PPTX attached, and the two USPTO word mark filings, are the *only* relevant records held by the USPS Product Information Department regarding any product, proposal, or the like similar to Private Address Forwarding?

Regarding the rest, is there any way to limit the search within the OGC further? You indicated previously that it might be limited further by type of document, source, or the like. I don't know what such types exist within the class of OGC documents, and would appreciate knowing what divisions might exist within that class of documents.

Sincerely,
- Sai

On Tue, Dec 24, 2013 at 9:59 AM, Chavannes-Battle, Nancy P - Washington, DC <nancy.p.chavannesbattle@usps.gov> wrote:

RECORDS OFFICE



December 24, 2013

Sai

PO Box 401159

San Francisco, CA 94110

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Mail My Way

Patent Synopsis

May 15, 2013

“Mail My Way” is a mail delivery service that facilitates the customization and directing of both hard copy and electronic media mail between receivers and senders based on their mailing preferences.

Situatio

- Mail receivers do not have an easy methodology for establishing mail receipt preferences (e.g. physical vs. electronic mail delivery, undesired mailing categories they don't want to receive, etc.) without having their physical or postal mailing address identified
- Receivers have limited capability to proactively identify and/or eliminate what they determine to be spam, phishing or other undesired or malevolent correspondence

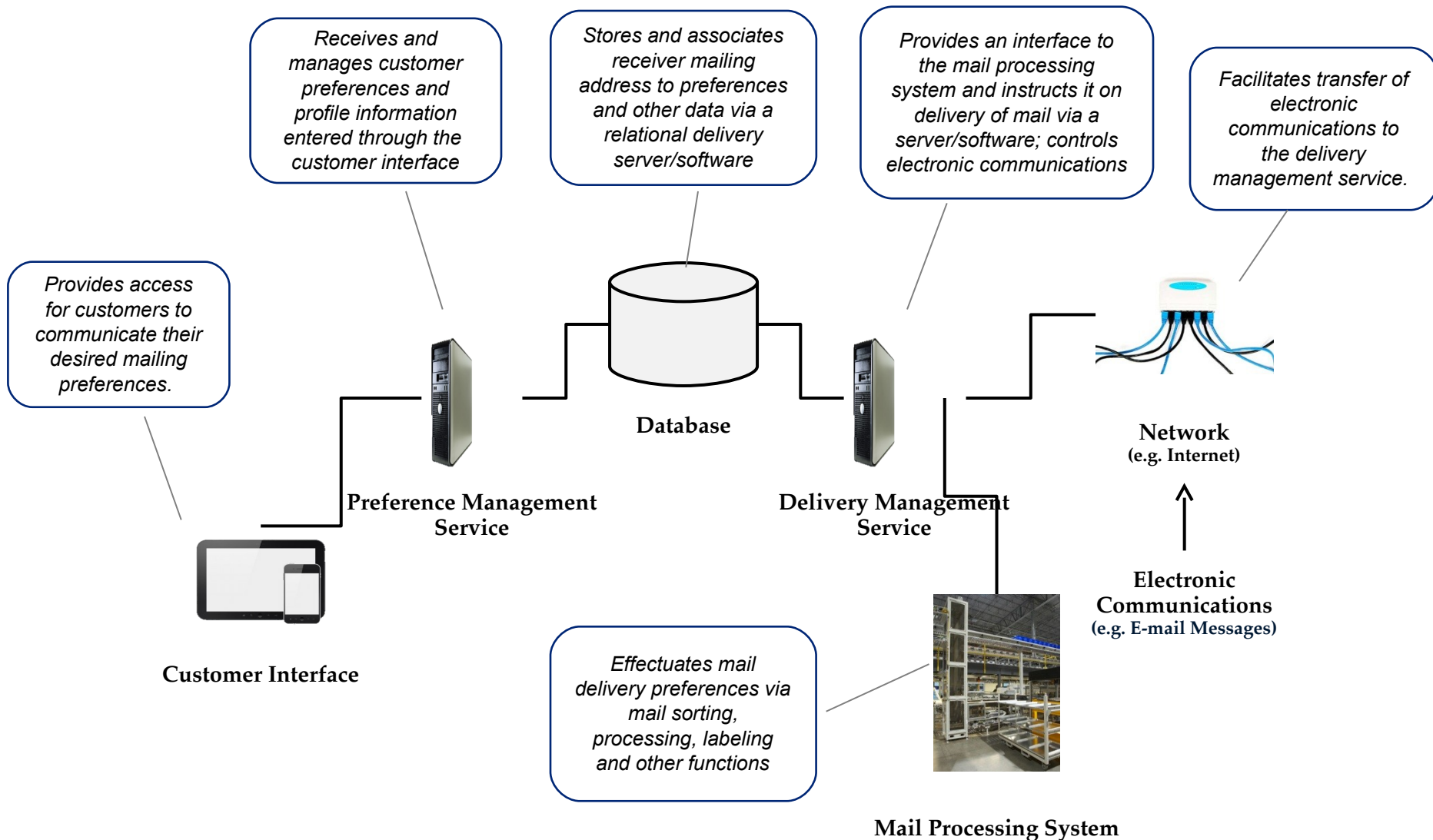
Complicatio

- Existing solutions are ad hoc and do not allow receivers to indicate preferences across a broad reach of categories
- Current repositories (e.g. from the Direct Mail Marketing Association) of delivery preferences are voluntary and can lead to frustration for receivers who receive unwanted communications from non-participating senders

Solutio

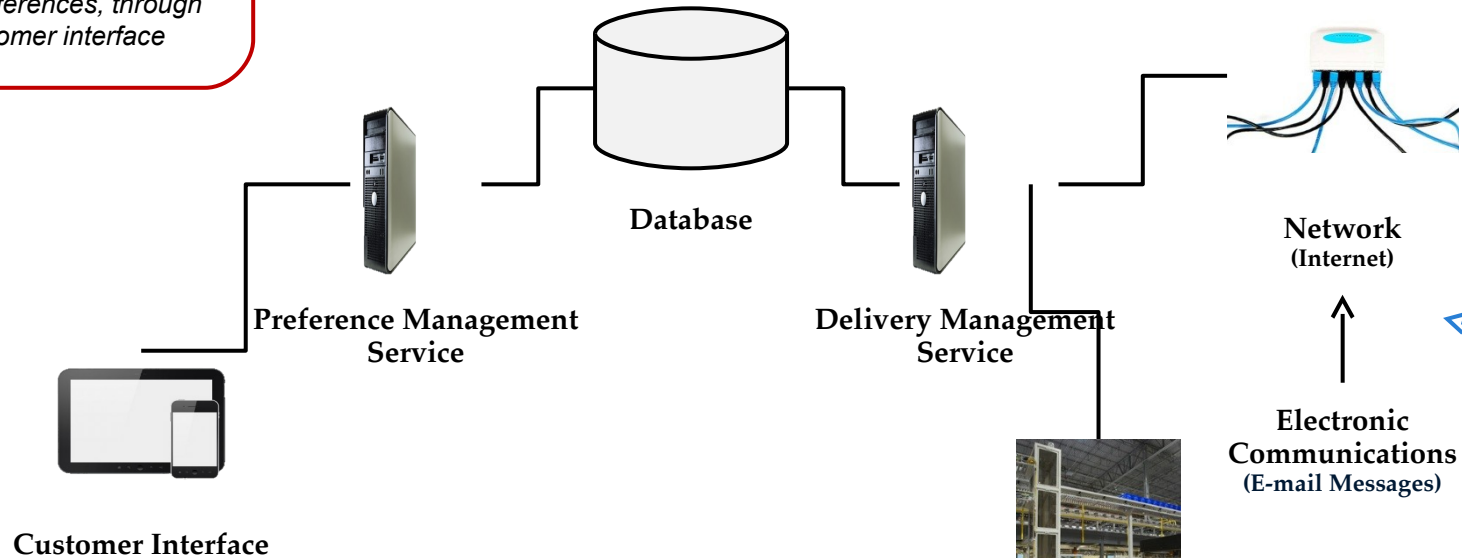
A service that...

- Improves receivers' control over delivery of physical and electronic mail by allowing them to communicate their preferences to receive specific types of mail by specific categories, characteristics, classes, or other features
- Addresses the customization and directing of both physical and electronic mail between receivers and senders while maintaining receiver privacy
- Provides receivers a designation/identification option to ensure that mail they are receiving meets the criteria they designate
- Enables a trusted party (e.g. USPS) to manage and/or direct the delivery or presentation of “customer-directed” communications



Receiver Input Point:

Receiver creates and manages username, password and profile information, including mailing preferences, through the customer interface

**Sender Input Point 1:**

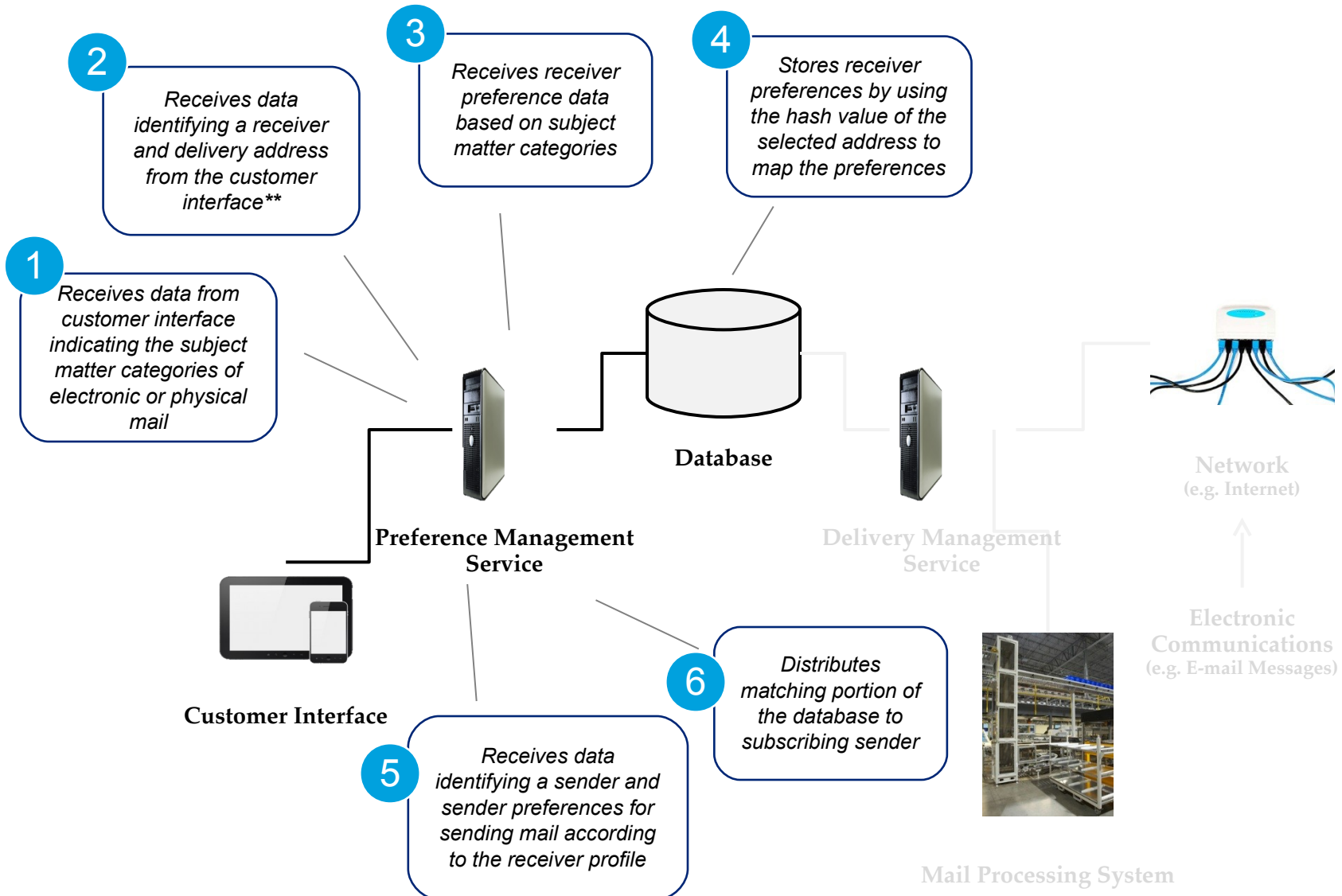
Sender creates and manages username, password and profile information, including location and categories of the types of communications it sends

Mail Processing System

**Sender Input Point 2:**

Sender uses a network to transfer electronic communications to the system for distribution

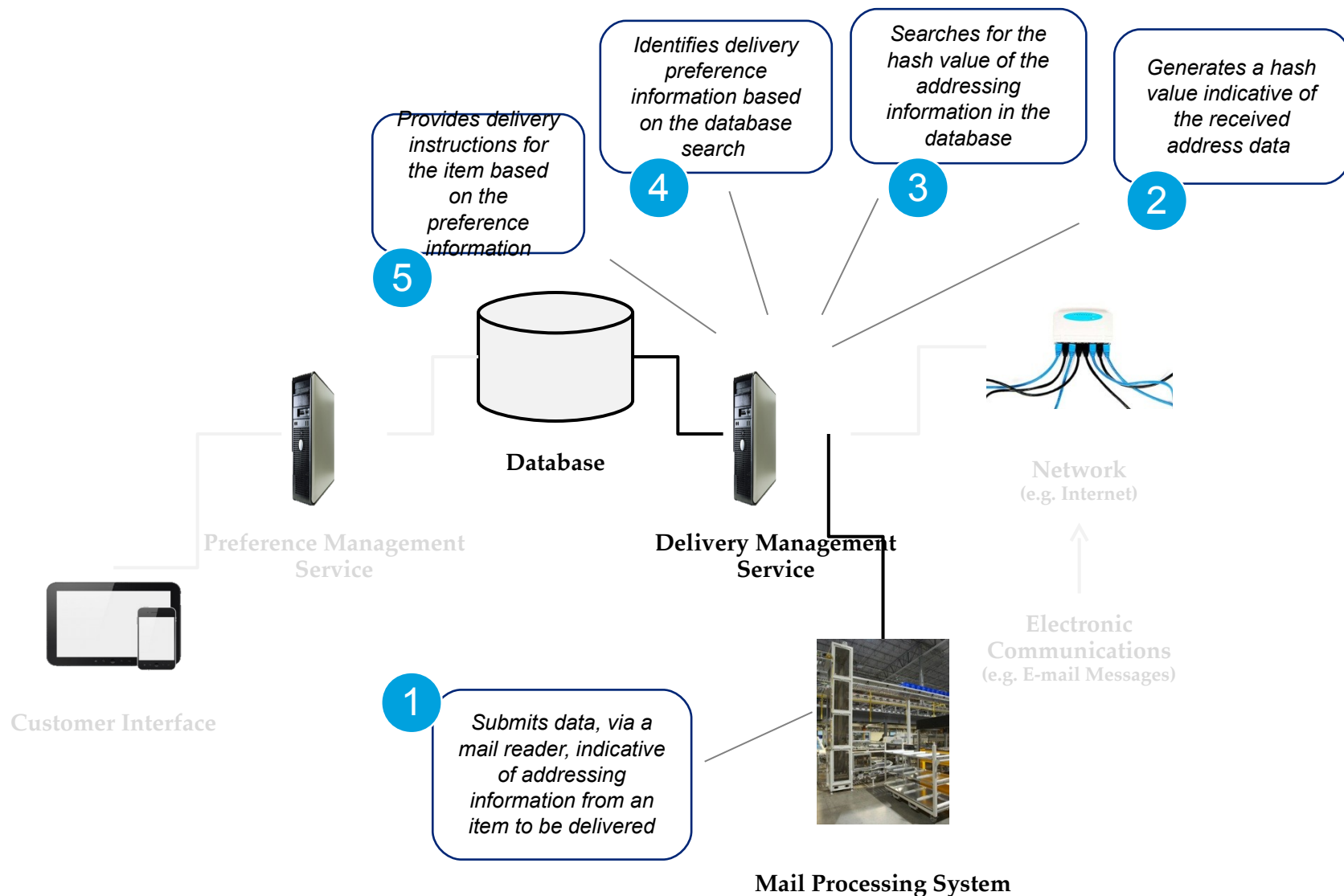
Use Case #1: Establishing Receiver Delivery Preferences in the Database



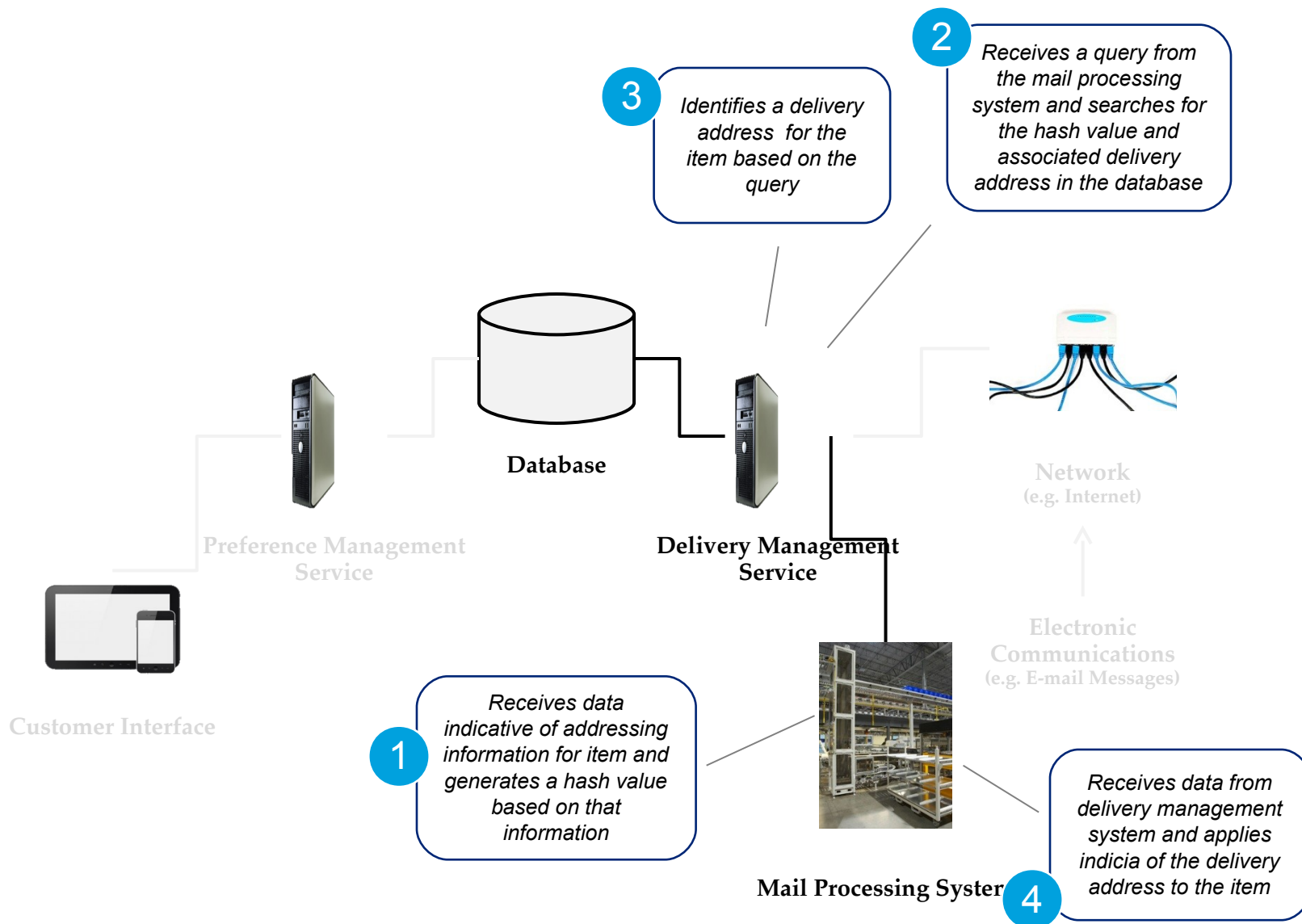
** The preference management system can be configured to validate receiver credentials (e.g. IDP)

Source: mailmyway.pdf. 2011

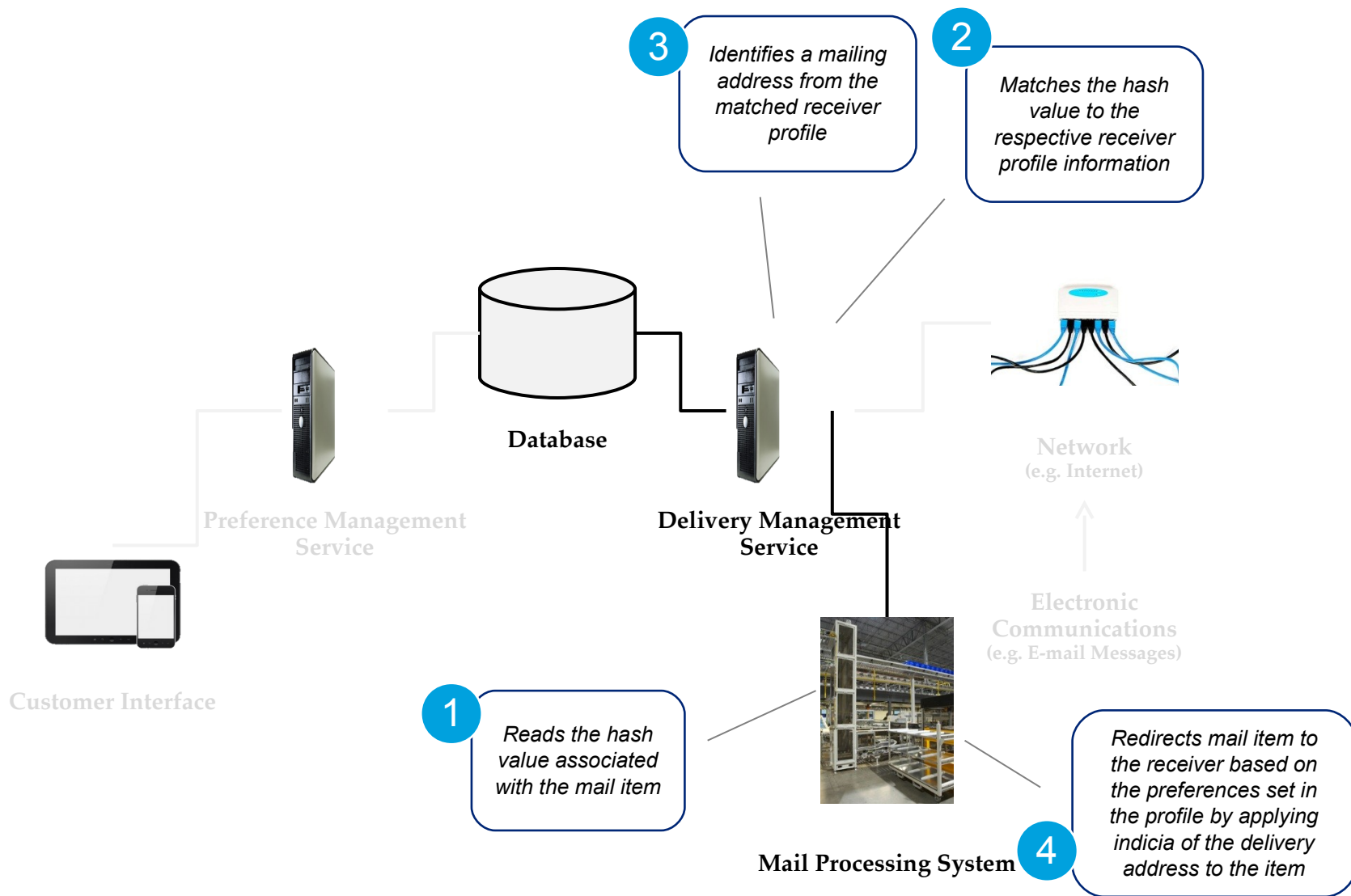
Use Case #2: Delivering an Item Based on Receiver Preferences in the Database



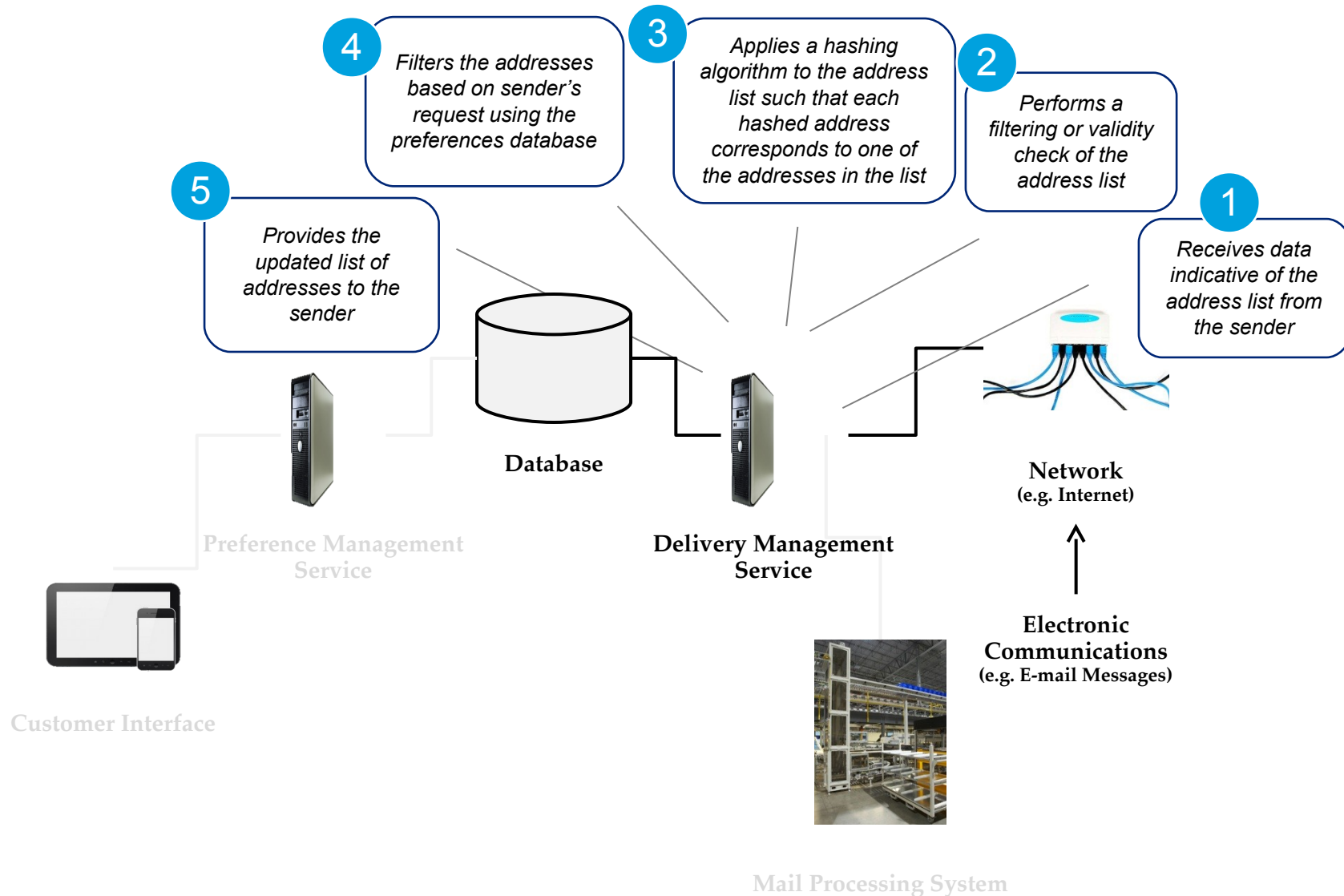
Use Case #3: Delivering Item Based on Virtual Address



Use Case #4: Delivering an Item Addressed with a Hash Value from a Direct Marketer



Use Case #5: Delivering an Item Based on a Sender's Existing Address List



Benefits/Value

Receiver...

- Physical address privacy
- Improved control over delivery of physical and/or electronic mail delivery
- Receivers who are away from home are able to receive important communication electronically

Sender...

- Provides senders access to the preferences database so that they can see consumer preferences (without seeing the actual receiver address)
- Senders can submit a list to a delivery service (e.g. USPS) to confirm address validity and receive an updated address list with invalid addresses identified
- Senders can submit a request to USPS for a list of recipients who are interested in a particular mailing category or type

Implication

- USPS can serve as the intermediary and manage the repository/database that communicates receiver preferences to senders while maintaining receiver privacy
- To establish a profile receivers and senders must establish and validate credentials through a system (**e.g. IDP**)
- There is a verification aspect that USPS can provide that ensures the sender is meeting the receiver's desired preferences
- USPS can charge a fee for the management of the preference management system
- Receivers and senders can leverage the preference management service to "opt" in for additional physical mail security services (**e.g. EPM**)
- If a piece of mail is incorrect (e.g. wrong address), then it is destroyed by the mail processing system instead of being sent back to the sender to protect the privacy/physical address of the recipient
- USPS may receive backlash from its two main customers (senders and MSPs) as a result of decreased physical mail volume

Questions to Address:

Who is the business owner of Mail My Way?

Does SDS want to own the Mail My Way system?

Does SDS want to use the system?

If SDS does want to use the system...

How does SDS want to use the system?

How can SDS wrap existing functionality into system?

How does SDS incorporate Mail My Way into USPS?

Additional Research:

Current USPS data capture processes outside of Mail My Way

Other relevant patents

“Do Not Mail Initiatives” and “Spam Filters”

Industry competitive analysis (e.g. sumbox, manilla)

Ecosystem/stakeholder impact analysis

USPS and SDS have an opportunity to own and/or manage several components of the “Mail My Way” system. The diagram below provides an example of some integration points.

